

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 1121

**FIRST SUPPLEMENTAL DECLARATION OF MARK W. HANCOCK IN
CONJUNCTION WITH THE RETENTION AND EMPLOYMENT OF
GODFREY & KAHN, S.C. AS COUNSEL TO THE FEE EXAMINER,
EFFECTIVE FEBRUARY 17, 2023**

I, Mark Hancock, hereby declare under penalty of perjury:

1. I am a shareholder with Godfrey & Kahn, S.C. (“**Godfrey & Kahn**”), counsel to the Fee Examiner in these Chapter 11 cases pursuant to the Court’s April 12, 2023 *Order Authorizing the Employment and Retention of Godfrey & Kahn, S.C. as Counsel to the Fee Examiner* (D.I. 1268). I am authorized to make this Declaration on behalf of myself and of Godfrey & Kahn. This Declaration is based on my personal knowledge, and if called to testify, I could and would testify competently to the written statements made in this Declaration. I submit this Supplemental Declaration for the purpose of providing supplemental information regarding Godfrey & Kahn’s connections with several retained professionals in this case.

2. On March 20, 2023, I submitted a declaration (the “**Initial Declaration**”) in support of the *Application of Fee Examiner for Authorization to Employ and Retain Godfrey &*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification number is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Kahn, S.C. as Counsel to the Fee Examiner; Effective as of February 17, 2023 [D.I. 1121 at 17-28] (the “**Retention Application**”).

3. Since filing the Initial Declaration, Godfrey & Kahn has become aware of additional connections to two interested parties in these cases. First, Godfrey & Kahn was retained to serve as local Wisconsin counsel for Paul Hastings on a real estate matter unrelated to these Chapter 11 cases. The Godfrey & Kahn attorneys staffed on that real estate matter were not, and will not be, staffed on these Chapter 11 cases. Second, Godfrey & Kahn has been retained to serve as local Wisconsin counsel for Sullivan & Cromwell on an appellate matter unrelated to these bankruptcy cases. The Godfrey & Kahn attorneys staffed on that appellate matter are not, and will not be, staffed on these Chapter 11 cases.

4. Based on the foregoing and the Initial Declaration and its appendices, to the best of my knowledge and belief, insofar as I have been able to ascertain after reasonable inquiry, I believe I am, and each member of my firm and my firm itself is, a “disinterested person” as that term is defined in 11 U.S.C. §101(14) because:

- A. Godfrey & Kahn is not a creditor, equity security holder, or insider of the Debtors.
- B. Godfrey & Kahn is not and was not, within two years before the Petition Date, a director, officer, or employee of the Debtors.
- C. Godfrey and Kahn does not have an interest materially adverse to the interest of the Debtors’ estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors or for any other reason.

5. Despite the efforts described above and in the Initial Declaration to identify and disclose Godfrey & Kahn’s connections with parties in interest in this case, I am unable to state with certainty that every client representation or other connection of Godfrey & Kahn has been

disclosed. In this regard, if Godfrey & Kahn discovers additional information that requires disclosure, I will file a supplemental disclosure with the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 12th day of September 2023.

GODFREY & KAHN, S.C.

By: /s/ Mark W. Hancock
Mark W. Hancock

CERTIFICATE OF SERVICE

I, Mark W. Hancock, hereby certify that on September 12, 2023, I caused a copy of the foregoing *First Supplemental Declaration of Mark W. Hancock in Conjunction with the Retention and Employment of Godfrey & Kahn, S.C. as Counsel to the Fee Examiner, Effective February 17, 2023* to be served upon the individuals registered to receive electronic notices via the Court's ECF electronic noticing system and requested Kroll provide service to the rest.

Dated this 12th day of September 2023.

/s/ Mark W. Hancock

Mark W. Hancock

29896944.2